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# **You've Been Selected to Be a VPP Onsite Team Member!**



## **Now What?**

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## About VPP

Welcome to the Voluntary Protection Programs (VPP) Team! You are about to join a multidisciplinary group that will evaluate the effectiveness of the safety and health program at a worksite seeking OSHA's recognition for excellence.

This is a great opportunity to see firsthand how an outstanding occupational safety and health program actually works. And it's a chance to help a site already committed to safety and health improve its program. Although the site visit is similar to an inspection in some regards, the cooperative approach creates an entirely different climate and focuses on the worksite's safety and health program. OSHA enters not unannounced, but at the invitation of the company. It's nice for a change to go where you're welcome and wanted. Enjoy the difference!

You will have received from the OSHA team leader, information about the site in advance of the visit, and usually, you also will have received your specific team assignments. The outcome of the visit will be a report supporting the OSHA VPP team's recommendation to the Regional Administrator or to the Assistant Secretary of Labor concerning the site's participation in the VPP.

VPP is a strong component of the "New OSHA's" commitment to partnership with companies that want to do the right thing. Your participation on the review team enables OSHA to recognize model programs and to encourage other companies to strive for excellence. Thanks for your help.

OSHA's VPP is built on the twofold foundation of

- voluntary workplace safety and health excellence, and
- cooperation among industry, labor, and government.

General industry, construction, and maritime sites may apply to the VPP. The application is initially reviewed by OSHA personnel at the regional office. When OSHA judges the application complete, a date is set, in cooperation with the applicant site, to conduct an onsite visit. This visit helps to determine if the safety and health program described in the application is effectively implemented at the site.

In the VPP application, the site's management agrees to correct any hazard found. Any hazards not corrected before the team leaves the worksite will be described, along with the agreed upon correction, in a document referred to as the "90 Day Item List," meaning that all items will be corrected within 90 days.

Managers and employees will be very helpful and cooperative. They will be eager to show you the successes of their safety and health program. When you have suggestions for improvement, they will be ready to listen to you. Because all hazards found will be corrected, and because the site has voluntarily requested an OSHA review, no citations will be issued.

VPP sites are models from which others in the industry can learn. They also serve as models for the safety and health specialists who comprise OSHA's VPP review teams, demonstrating the remarkable results that can follow when companies and their workers place a priority on workplace safety and health.

To assess a site's safety and health program, the VPP team will review program-related documents at the site, interview employees and site contractors, and tour the site. The final day at the site usually is spent writing the draft report of the team's findings.

You can expect your days at the site to be long and the work to be intense, but you can also expect to enjoy the spirit of cooperation typical of VPP site visits. We will all be working toward one goal: to keep America's workers safe and healthy.



## Types of Onsite Review

In participating in a VPP onsite review, there are a number of things you need to be familiar with—such as the opening conference, documentation review, site tour, formal interviews, preparation of findings, and evaluation. Let's take a look at what you need to do at the site and after the visit.

### Pre-Approval Onsite Review

If you have been selected to participate on a pre-approval onsite review team, you will be assessing the safety and health program of the applicant worksite. This means the site has decided to apply to the VPP, has worked to implement quality protection for employees, and has invested many hours in preparing its application to participate. You will help determine if the worksite qualifies for the VPP. The goals for a pre-approval onsite review are as follows:

- *Verification.* Ascertain the accuracy of the information supplied in the application.
- *Program Assessment.* Identify both the strengths and weaknesses of the site's safety and health program as currently implemented.
- *Recommendation.* Compile data for the Assistant Secretary of Labor to make an approval decision.

### The Evaluation Onsite Review

If you have been selected to be part of a VPP evaluation onsite review team, you will be assessing the safety and health program of a current participant in the VPP. It may be between 1 and 5 years since the last VPP onsite review, depending on the program in which the worksite participates and the length of time the site has been in the program. The following four goals apply to the evaluation onsite review:

- *Program Assessment.* Determine that the program continues to provide effective safety and health protection to employees.



- *Goal Progress* (for Merit and 1-year conditional evaluations). Determine the progress toward reaching Merit goals or 1-year conditional goals.
- *Program Effectiveness* (for Demonstration evaluations). Determine the effectiveness of alternative requirements being tested.
- *Recommendation*. Compile for the Assistant Secretary of Labor or the Regional Administrator, as appropriate, information necessary to make a decision to continue the site in its current program or advance the site to the Star program.

The review of a participating VPP site's safety and health program follows the same procedures established for the pre-approval onsite review, except for the following:

### ***Merit Sites***

At sites participating in the Merit program, the team will assess the site's progress toward meeting its Merit goals.

- If the site has met all its Merit goals, and if the site's performance remains strong with regard to the other requirements for Star, the team may recommend that the Assistant Secretary of Labor approve the site as a Star site.
- If the site is making good progress toward meeting its Merit goals, but if time remains in the approved Merit period, the team may recommend continuation as a Merit site. This recommendation is made to the OSHA Regional Administrator, who has the authority for approval.
- If the site is not making good progress toward meeting its Merit goals, and if the time in the approved Merit period has elapsed, the team may recommend to the Regional Administrator that the site discontinue participation in the VPP.
- If the site has not completed its Merit goals and the approved period for Merit has expired, but the site has made a consistent and good effort to meet the goals

and has had its performance affected by significant change, such as a change in plant manager, the team may recommend that the Regional Administrator extend the Merit period.

### ***Star Sites***

At sites participating in the Star program, the team will assess the safety and health program to determine whether the site remains at Star quality. The team should make particular note of program improvements since the previous onsite visit.

- If the site continues to meet all the requirements for Star, the VPP onsite review team may recommend that the Regional Administrator approve continuation of the Star program. The Director of the Directorate of Federal-State Operations in the national office should be informed of the approval, and the Assistant Secretary of Labor will send a letter to the plant manager indicating his knowledge of the approval.
- If the site has a good program in place, but one or two of the program elements has slipped slightly in quality, the VPP onsite review team may recommend to the Regional Administrator a 1-year conditional approval, with specified goals to meet within that 1 year. When the team reviews the site at the end of that year, if it recommends to the Regional Administrator a return to full Star status, that date of approval is considered the site's first year in Star for purposes of future evaluation.
- If the site has slipped so far from Star quality that the team judges the site's commitment to safety and health excellence to be insufficient, the team may recommend to the Regional Administrator that the site withdraw from the VPP.

## ***Demonstration Sites***

At sites participating in the Demonstration program, in addition to determining that the worksite is maintaining a Star quality safety and health program, the team will determine if the alternatives to the Star requirements being demonstrated provide effective protection to employees. All demonstration approval decisions are made by the Assistant Secretary.

- If the team determines that the alternatives require further testing, it recommends approval for continuation in the Demonstration Program.
- If the team determines that the alternatives provide effective protection, it recommends that the Star program requirements be changed to permit inclusion of the alternative requirements.
- If the team determines that the alternatives are creating ineffective protection, it recommends that the Demonstration be ended and the worksite withdraw from the Demonstration program.

## **The Team**

The onsite review is conducted by a team of OSHA personnel, often supplemented by Special Government Employees (SGEs) with occupational safety and health expertise who have volunteered from participating VPP sites and personnel from other government agencies. The VPP regional program manager chooses the team. Team size will depend on the size and complexity of the site, but will include the following:

- A team leader (OSHA)
- A safety professional (OSHA or SGE), and
- An industrial hygienist (OSHA or SGE).

At large and/or more complex sites, the team may be expanded to include the following:

- Other safety and health professionals, such as a PSM specialist (OSHA or SGE), and
- A back-up team leader (OSHA).

## Planning the Visit

The *team leader* coordinates arrangements for the onsite review. This requires that he/she

- Be thoroughly familiar with the site's application;
- Provide pertinent information, including sections of the application, to team members;
- Coordinate the timing and duration of the review with team members and site management; and
- Determine what personal protective equipment (PPE) team members should bring and what PPE will be provided by the site.

The team leader will conduct a strategy meeting just prior to the onsite review. All team members must attend. At this meeting, team members assignments will be reviewed for completing the following specific onsite review tasks:

- Review of injury log and recalculation of rates,
- Review of the written safety and health program and supporting documentation,
- Site walkthrough and informal employee interviews,
- Formal interviews, and
- Draft preparation of the review report.

	Monday	Tuesday	Wednesday	Thursday	Friday
AM	Travel Strategy Meeting	Records and Document Review	Formal Interviews & Site Tour	Report Writing	Closing Conferencence
PM	Opening Conference & Site Tour	Document Review Site Tour	Formal Interviews and Site Tour	Report Writing	Travel

The following chart describes a typical week for onsite evaluations.

At the end of each day, the team will hold a short meeting to share the experiences of the day. This is followed by a brief reporting session between team members and personnel

designated by the site, such as the site safety manager, the plant manager, and any designated hourly employees. The joint session provides the opportunity to share the day's findings, ask and answer any questions, and raise concerns. Often the team's recommendation can be shared with this group on Thursday evening.



## **Conducting the Visit**

### **The Opening Conference**

The team leader leads the initial briefing of personnel designated by the site. This briefing defines the review's scope and expectations and clarifies needed assistance.

### **Documentation Review**

The team will review site documents relating to all aspects of the safety and health program to determine whether they adequately address hazards at the site. Sample items to be reviewed include the OSHA 200 log, health hazard reports, and other documents and information, such as the following:

- OSHA 200 injury/illness logs for the past 3 full calendar years and year-to-date, with supporting documents such as workers' compensation first reports of injuries, first-aid logs, and employee medical records. In advance of the onsite visit, the team leader will provide the site with a medical access order. The employer must post this order in an obvious place. The team will review site logs and site logs for the contractors whose employees have worked on the site at least 500 hours a quarter.
- Baseline surveys for safety and health hazards, including all industrial hygiene sampling records and material safety data sheets (MSDSs).

- Evidence of line accountability, such as performance evaluations and bonus systems.
- Hazard analyses, such as change analyses, process hazard reviews, job hazard analyses, and phase hazard analyses.
- Employee reports of safety and health hazards and suggestions, including documented responses.
- Reports of site inspections and accident investigations, including documented responses.
- Preventive maintenance records.
- Emergency procedures, including critiques of drills and documented responses to recommendations for improvement.
- All specialized programs required for compliance with OSHA regulations, such as lockout/tagout, confined spaces, and bloodborne pathogens, to name a few.
- Safety Committee minutes, if applicable, and/or records of other methods of employee involvement.
- Training records, including types of training given, how curriculum is developed and reviewed, how understanding of training is assessed, and how an individual employee's training is documented.
- The annual evaluation of the site's safety and health program, including documented responses to the evaluation's suggestions for improvement.

Team members may request additional documents and records for review. Requests for documents must be properly and clearly communicated to the applicant.

## **Site Tour**

The review team's site tour ensures that the safety and health program is operating as described in the application and ascertains the effectiveness of the program's implementation. There are a number of reviews the team performs during the tour, which are identified in the following paragraphs.

### ***Safety Review***

The *safety professional(s)* conducting this review should

- Follow the entire process/operation flow, where possible;
- Suggest revisions to the corresponding safety and health management system documents (e.g., emergency planning, self-assessment procedures and reports, and employee complaints or reports of hazards) where work procedure improvements are needed; and
- Note specific hazards needing correction and discuss a time frame for correction.

### ***Industrial Hygiene Review***

The *industrial hygienist* should

- Follow the entire process/operation flow, where possible;
- Check known hazard areas, where applicable (e.g., ventilation, storage, handling and use of toxic materials, emergency equipment, respirator use and maintenance, and radiation and noise protective measures), based on review of monitoring records and material safety data sheets. Look for possible problems in work practices;
- Look for evidence that these hazards are appropriately managed and that no other hazards have escaped management's attention; and
- Suggest program revisions to the corresponding safety and health management system documents where improvements are needed (e.g., safe work practices and training, respirator program, industrial hygiene sampling and analysis, and hazard communication systems).

### ***Informal Interviews***

- During the tour, team members will interview randomly selected employees at their work stations. Interviewers should include supervisors, maintenance personnel, safety committee members, and contract and temporary employees.

- Typical questions should address work procedures, emergency procedures, and PPE.
- Interviews should be conducted in a manner that avoids disruption of normal operations.
- Interviews are to be conducted in a confidential manner that encourages employees to speak freely.
- Contractor employees should be included in the informal interviews to ensure that equally effective protection is provided to all employees involved in the contractor's operations.

### ***Problem Areas***

Special attention should be given during the site tour to any problems that have shown up repeatedly during interviews and records review, especially during the review of the OSHA 200 log.

### ***Hazard Correction***

All hazards found must be corrected immediately, if possible, and otherwise within 90 days. When safety and health program deficiencies are found, the onsite review team and site personnel will agree upon goals for program improvement.

### ***Formal Interviews***

The team leader and, where present, the backup team leader conduct the formal interviews.

### ***Management Interviews***

Interviews with site management provide the review team with information about the site's safety and health program, management's commitment to and involvement in the program, and the management oversight system.



### ***Employee Interviews***

Employee interviews gauge the extent of employee awareness of hazards, and awareness of and involvement in the program, and the management oversight system.

### ***Contractor Interviews***

Contractor interviews indicate the contractors' awareness of site hazards and of the site's requirement for a contractor's safety and health program.

### ***Preparation of Findings***

Prior to closeout with the site's management, the team should meet to review and summarize its findings. To achieve team consensus, time should be allowed for a complete discussion of issues, such as the following:

### ***Compliance and Status of Correction***

- Items that cannot be corrected immediately will be described along with proper correction. This list, referred to as the "90-Day Items," will be attached to the draft report given to the site management.
- The draft report of the team's findings will not be prepared for the Assistant Secretary's signature until the regional VPP manager has received assurances in writing that all 90-day items have been corrected.

### ***Eligibility for VPP***

- If the team decides that the site is eligible for Merit, the team then must agree on the Merit goals (the programmatic improvements the site must make), the evidence the site must produce to show that the goals have been met, and the amount of time the site will be allotted to make these improvements, usually from 2 to 4 years.
- If the team decides that the site is eligible for Star, the team will write the report recommending Star approval. This report will stress the particularly

impressive aspects of the site's safety and health program. Important considerations include whether

- A Star site has few 90-day items to correct,
- All safety and health program elements and subelements have been in place and operating effectively for at least 1 year, and
- Injury incidence and lost-workday case rates are at or below the most recently published industry average.

### ***Non-Eligibility for VPP***

If the team decides that the site is not eligible for VPP, the site leader will suggest that the site withdraw its application. If the team chooses not to withdraw, the team will write a report clearly stating the deficiencies and recommending no approval.

### **Team Responsibilities**

- The team leader is responsible for preparing a report following the format prescribed in TED 8.1a, *VPP Policies and Procedures Manual*,\* Appendix F or H, as appropriate. He or she may assign other team members to prepare sections of the report.
- The draft report will be written before the team leaves the site, whenever possible.
- Each team member will review the draft report, which will reflect the team's consensus on the applicant's qualifications for approval.

### ***Review by Applicant***

Before the final report is issued, the team leader will give the applicant an opportunity to review the draft report for accuracy. The applicant will be assured that factual corrections will be made.

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\*For copies of the manual, contact the nearest OSHA regional office listed elsewhere in this booklet, or call the OSHA Directorate of Federal-State Operations at (202) 219-7266. See also OSHA's Web site at <http://www.osha.gov/> for this and other agency information.

## **Presentation of Findings and Recommendations**

### ***Preliminary Briefing***

The onsite review findings may be presented to the applicant in a preliminary briefing, prior to the formal presentation. This preliminary briefing is usually held Thursday evening.

### ***Final Briefing***

The team leader and team members will hold a formal, final briefing with site management and employee representatives at the conclusion of the onsite review. The team's findings and its recommendation to the Assistant Secretary of Labor or Regional Administrator must be presented before leaving the site. The team leader will stress that the team is making a recommendation, not an approval decision. The responsibility for making a decision regarding a new approval rests with the Assistant Secretary of Labor, and for continuation in the Star and Merit programs, with the Regional Administrator.

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